

1 BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General
2 ALEXANDER K. HAAS
Director, Federal Programs Branch
3 ANTHONY J. COPPOLINO
Deputy Director, Federal Programs Branch
4 ANDREW I. WARDEN (IN #23840-49)
Senior Trial Counsel
5 U.S. Department of Justice
6 Civil Division, Federal Programs Branch
7 1100 L Street, NW
Washington, D.C. 20530
8 Tel.: (202) 616-5084
Fax: (202) 616-8470
9 *Attorneys for Defendants*

10 **UNITED STATES DISTRICT COURT**
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
12 **OAKLAND DIVISION**

13 STATE OF CALIFORNIA, *et al.*,
14 Plaintiffs,
15 v.
16 JOSEPH R. BIDEN, JR., *et al.*,
17 Defendants.

18 SIERRA CLUB, *et al.*,
19 Plaintiffs,
20 v.
21 JOSEPH R. BIDEN, JR., *et al.*,
22 Defendants.
23
24

No. 4:19-cv-00872-HSG
No. 4:19-cv-00892-HSG
No. 4:20-cv-01494-HSG
No. 4:20-cv-01563-HSG

JOINT STATUS REPORT

25 In accordance with the Court's Order of March 15, 2022, Plaintiffs and Defendants submit
26 the following joint status report addressing proceedings in the above-captioned cases.

27 The parties remain in active settlement discussions and request that the Court continue the
28

1 stay of these cases for 90 days. On March 15, 2022, Magistrate Judge Ryu conducted a video
 2 status conference that set a schedule for upcoming proceedings in the settlement process. The
 3 parties have since exchanged information related to Plaintiffs' environmental settlement demands.
 4 Defendants are due to provide Plaintiffs with additional information on June 17, 2022, and Judge
 5 Ryu has scheduled a mediation session with the parties via videoconference on July 26, 2022.

6 The parties continue believe that their settlement discussions in these complex matters are
 7 progressing forward in good faith. The parties agree that the interests of party and judicial
 8 economy would be furthered by allowing the parties to continue these ongoing discussions with
 9 the goal of reaching a mutually-agreeable resolution without the need for further litigation. The
 10 parties propose to file another joint status report on September 13, 2022.

11
 12 DATE: June 13, 2022

Respectfully submitted,

14 BRIAN M. BOYNTON
 Principal Deputy Assistant Attorney General

16 ALEXANDER K. HAAS
 Director, Federal Programs Branch

18 ANTHONY J. COPPOLINO
 Deputy Director, Federal Programs Branch

19 /s/ Andrew I. Warden
 20 ANDREW I. WARDEN
 Senior Trial Counsel (IN Bar No. 23840-49)
 21 MICHAEL J. GERARDI
 Trial Attorneys
 22 U.S. Department of Justice
 23 Civil Division, Federal Programs Branch
 1100 L Street, NW
 24 Washington, D.C. 20530
 25 Tel.: (202) 616-5084
 Fax: (202) 616-8470
 26 E-Mail: Andrew.Warden@usdoj.gov

27 *Counsel for Defendants*

/s/ Dror Ladin

DROR LADIN*
NOOR ZAFAR*
HINA SHAMSI*
OMAR C. JADWAT*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004
Tel: (212) 549-2660
dladin@aclu.org
hshamsi@aclu.org
ojadwat@aclu.org
nzafar@aclu.org

CECILLIA D. WANG (SBN 187782)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
39 Drumm Street
San Francisco, CA 94111
Tel: (415) 343-0770
cwang@aclu.org

SANJAY NARAYAN (SBN 183227)**
GLORIA D. SMITH (SBN 200824)**
SIERRA CLUB ENVIRONMENTAL
LAW PROGRAM
2101 Webster Street, Suite 1300
Oakland, CA 94612
Tel: (415) 977-5772
sanjay.narayan@sierraclub.org
gloria.smith@sierraclub.org

*Attorneys for Plaintiffs in
4:19-cv-00892-HSG and
4:20-cv-01494-HSG*

**Admitted pro hac vice*

***Attorneys for Plaintiff Sierra Club only*

ROB BONTA
Attorney General of California
ROBERT W. BYRNE
MICHAEL L. NEWMAN
EDWARD H. OCHOA
Senior Assistant Attorneys General
MICHAEL P. CAYABAN
JAMES F. ZAHRADKA II
Supervising Deputy Attorneys General
JANELLE M. SMITH

/s/ James E. Richardson
JAMES E. RICHARDSON
Deputy Attorney General
1515 Clay St., Suite 2000
Oakland, CA 94612
Tel.: (510) 879-0285
E-mail: James.Richardson@doj.ca.gov

*Attorneys for Plaintiff State of
California in 4:19-cv-00872-HSG and
4:20-cv-01563-HSG*